



# COMMONWEALTH of VIRGINIA

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## MEMORANDUM

**To:** Donald Fritz, Chairman  
Virginia Pesticide Control Board  
Virginia Department of Agriculture and Consumer Services

**From:** J. Jasen Eige  
Senior Assistant Attorney General

Steven P. Jack  
Assistant Attorney General

**Date:** January 23, 2007

**Subject:** Letter of Assurance for Amendments to Board Regulations Governing Pesticide Applicator Certification, 2 VAC 20-51

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I have reviewed the Virginia Pesticide Control Board's proposed amendments to its regulations that were posted on the Virginia Regulatory Town Hall internet site on October 26, 2006. In my view, as counsel to the Virginia Pesticide Control Board, these regulations may be promulgated pursuant to §§ 3.1-249.30, 3.1-249.51, 3.1-249.52, 3.1-249.53, 3.1-249.54, 3.1-249.55, and 3.1-249.56 of the *Code of Virginia*. The regulations do not appear to conflict with the Constitution of the United States or the Constitution of the Commonwealth of Virginia, nor do they appear to conflict with any federal or state law currently in effect.

This memorandum addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the proposed regulations.

